

February 2009

Certification of CPNI Filing
EB-06-TC-060
EB Docket No. 06-36

ANNUAL CERTIFICATION
Customer Proprietary Network Information Procedures of
Total Customer Services, Inc.

I, Mark Gailey, do hereby certify that I have personal knowledge that Total Customer Services, Inc. ("Total CSI") has established procedures regarding the Customer Proprietary Network Information related to the subscribers of Total CSI. These procedures, described on the attached page, are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2009.

Signed: 

By: Mark Gailey
President & General Manager
Total Customer Services, Inc.

February 2009

**Certification of CPNI Filing
Total Customer Services, Inc.**

Total Customer Services, Inc. ("Total CSI") hereby submits that its procedures regarding its subscribers' Customer Proprietary Network Information ("CPNI") are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2009.

Total CSI certifies that it protects and utilizes its customers' CPNI in compliance with the Commission's rules in 47 CFR §§64.2001-64.2009 and does not sell or disclose subscriber CPNI to outside entities. In addition Total CSI does not disclose nor allow access by others to subscribers' CPNI for the purpose of identifying customers placing calls to competing carriers.

Total CSI's employees have been educated about CPNI as well as the related federal regulations and Total CSI's statutory responsibility to its customers. All requests for subscriber CPNI are forwarded to Senior Management personnel and any unauthorized use, sale, or disclosure of CPNI by any employee would subject the employee to disciplinary action, up to and including dismissal.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket #06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: Monday, February 23rd, 2009

Name of company covered by this certification: Totel Customer Services, Inc.

Form 499 Filer ID: 823618

Name of signatory: Mark Gailey

Title of signatory: President & General Manager

I, Mark Gailey, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Signed:



Print Name: Mark Gailey

Title: President & General Manager
Totel Customer Services, Inc.

Date: Friday, February 20th, 2009

Statement of Compliance with the FCC's Customer Proprietary Network Information "CPNI" Rules and Regulations

Total Customer Services, Inc.'s ("Total CSI") operating procedures certify that Total CSI is in compliance with the FCC's rules and regulations regarding Customer Proprietary Network Information (CPNI).

All of Total CSI's employees are aware that disclosure of our customers' CPNI information without obtaining the proper customer approval is a violation of the FCC's rules set forth in 47 U.S.C. 222 and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R. 64.2001 through 64.2009.

Total CSI has taken the steps and has internal procedures in place so as to educate our employees through training regarding the FCC's rules and regulations as to when and where CPNI information may be released. The employees that have access to this information are aware that the FCC prohibits the disclosure of such information without the proper customer consent and as allowed by law and the FCC's rules.

Any employee that violates Total CSI's CPNI operating procedures is subject to disciplinary action, up to dismissal.

Total CSI mandates yearly CPNI training for all employees to ensure up to date compliance with any new regulations.

Total CSI has implemented safeguards for our customers' protection against pretexters consistent with the FCC's requirements in Section 47 C.F.R. 64.2010.

Total Customer Services, Inc. has not taken any actions against data brokers in the past year regarding any breach of CPNI information.

Total Customer Services, Inc. has not received any customer complaints in the past year concerning the unauthorized release of CPNI.